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Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
COMMENTS ON DRAFT REGULATORY GUIDE
DG-1043, NUCLEAR POWER PLANT SIMULATION
FACILITIES FOR USE IN OPERATOR LICENSE
EXAMINATIONS

Gentlemen:

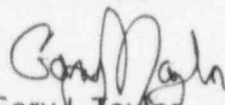
This letter provides South Carolina Electric & Gas Company's (SCE&G) comments on Draft Regulatory Guide DG-1043, Proposed Revision 2 to Regulatory Guide 1.49, Nuclear Power Plant Simulation Facilities for use in Operator License Examinations.

SCE&G believes that the scope of Regulatory Guide 1.149, Revision 2, is too prescriptive and unnecessarily expands the scope of annual certification testing. Rather than write new procedures and increase the scope of annual certification testing, validation of scenarios should be relied upon to test/verify operation of all malfunctions, component failures, or overrides used in annual requalification examination scenarios.

Please find specific comments on Regulatory Guide 1.149, Revision 2 attached.

Should you have any questions, please call Mr. Ricky Myers at (803) 345-4384, at your convenience.

Very truly yours,


Gary J. Taylor

RAM:ews
Attachment

c: J. L. Skolds
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S. Dembek
R. R. Mahan (w/o attachment)
NSRC
File (811.05)

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COMMENT ON DRAFT REGULATORY GUIDE
DG-1043

1. ENDORSEMENT OF ANSI/ANS-3.5-1993

The draft regulatory guide endorses ANSI/ANS-3.5-1993. SCE&G suggests that the regulatory position clearly state that either ANSI/ANS-3.5 1985 or 1993 is acceptable.

2. Position 1.5 & 1.6

A. This change tremendously expands the scope of testing to include not only malfunctions, but LOA's used as malfunctions, overrides, globals, and flexleaks. There are hundreds of malfunctions, thousands of overrides and globals, and about a hundred flexleaks. Even with using only the ones in scenarios and examinations there will be a large impact on resources.

B. In the past globals, overrides, and flexleaks were tested using temporary procedures which require an author and one reviewer, or were tested during scenario or examination development by a subject matter expert.

The draft regulatory guide will require the need to develop a large number of procedures to formally test overrides, globals, LOA's, and flexleaks.

Considerable time will be needed to add these malfunctions to the certification plan and test them and will also require a modification to the test plan requiring NRC notification on form NRC-474.

C. Training will have to identify all the overrides, LOA's, globals, and flexleaks used in training and examinations. Since NRC examiners may substitute their own scenarios with their own malfunctions how can these be pre-identified unless all malfunctions are tested?

SCE&G believes the best and most effective approach to handling this issue due to the large number of global, LOA's, and flexleaks, is to test these malfunctions during scenario and examination development by using subject matter experts or temporary procedures. This process is already in use and serves to confirm and even double check certified malfunctions prior to training or examination. It is effective both in time and resources and provides the maximum confidence prior to use.

3. Position 1.8

The present simulator certification is formatted based on Appendix A of ANSI/ANS 3.5-1985. Unless SCE&G's suggestion to clearly state that ANSI/ANS 3.5-1985 or 1993 is acceptable, utilities will be pressured to adopt the most recent standard. Conversion to the 1993 standard will require a large number of procedures to be revised and the need to reformat and update the certification files.

4. VALUE/IMPACT ANALYSIS

This proposed revision should have a value/impact analysis performed. It will be very expensive to adopt ANSI/ANS 3.5-1993 in terms of both initial and annual resources, with little or no improvement in simulator training quality. It is not appropriate in this case to adopt the value/impact analysis for the amendments to 10 CFR Part 55 that were published on March 25, 1987.

5. Conclusion

This draft regulatory guide is not consistent with ongoing NRC and industry efforts to relax and allow less prescriptive and more performance-oriented alternatives to those requirements that are prescriptive and marginal to safety and impose a significant regulatory burden.